

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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EVAN ANDREWS,	:	
	:	
Plaintiff,	:	
	:	
-against-	:	CIVIL ACTION NO. 1:16-CV-06414-RJS
	:	
AL JAZEERA MEDIA NETWORK	:	
("AJMN"), AL JAZEERA AMERICA	:	
("AJAM") AND INFINITY CONSULTING	:	
SOLUTIONS ("ICS"),	:	
	:	
Defendants.	:	
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**DECLARATION OF MIKE SOKARY**

Pursuant to 28 U.S.C. § 1746, I, Mike Sokary, hereby declare as follows:

1. I am the Manager of International Human Resources of Defendant Al Jazeera Media Network ("AJMN"). I have held this position since January 1, 2013. I submit this declaration in support of AJMN's Motion to Dismiss Plaintiff's Second Amended Complaint Pursuant to Fed. R. Civ. P. 12(b)(2). I have personal knowledge of the facts set forth herein, except where otherwise indicated.

2. AJMN is a Qatari corporation with a principal place of business in Doha, Qatar.

3. Attached hereto as Exhibit A is a true and correct copy of Law No (1) – 1996 Establishing the Qatari Satellite Channel General Corporation.

4. Attached hereto as Exhibit B is a true and correct copy of Law No. (10) of 2011 In Respect of Conversion of Al Jazeera Satellite Network to Private Corporation for Public Utility.

5. AJMN currently does not conduct, and did not conduct at any time relevant to this motion, any business in the State of New York. AJMN does not maintain an office in New York and is not licensed or otherwise registered to do business in New York. AJMN does not have a

registered agent in New York or any New York officers, employees or agents.

6. AJMN does not own or rent any real property within New York. Furthermore, AJMN does not have a bank account in New York, nor does AJMN have a New York telephone listing or maintain any books or records in New York.

7. AJMN has more than 4,000 staff members throughout its offices and bureaus worldwide. This number does not include staff members of AJMN's subsidiaries. AJMN does not have any offices or bureaus in New York.

8. AJMN's offices and bureaus do not have independent licenses to broadcast. They are funded by AJMN to gather content which is then broadcast on AJMN channels.

9. Unlike AJMN's offices and bureaus, AJMN's subsidiaries have their own broadcasting licenses and gather content for their own use. They do not provide broadcasting content to AJMN.

10. Al Jazeera America, LLC ("AJAM") is a New York-based subsidiary of AJMN. AJAM is not a bureau or office of AJMN. When AJAM was in operation, it had its own broadcasting license and supplied broadcasting content to American audiences only. It did not provide broadcasting content to AJMN and its content was not broadcast on AJMN channels.

11. On January 13, 2016, AJAM's CEO, Al Anstey, announced that AJAM was shutting down its cable TV and digital operations by April 30, 2016. The decision to shut down the operations of AJAM was made by AJAM's own Board of Directors.

12. AJMN and AJAM are two distinct corporate entities. AJAM was acquired as an indirect wholly-owned subsidiary of AJMN. While AJAM was funded by AJMN, AJAM had its own financial department, bank account and payroll; filed its own financial statements and tax returns independent of AJMN; and set its own annual budget. AJMN did not control day-to-day operations and management of AJAM.

13. When AJAM was operating its business, AJMN was not involved in the selection

and hiring of AJAM's staff and did not post any AJAM positions on its career site. All employment applications for AJAM were either provided by Current TV, as part of the acquisition, or handled through AJAM's online recruiting tool, Jazz. Some freelance applications were processed through Infinity Consulting Services, a third-party agency. All interviews were conducted by AJAM's management in New York.

14. Plaintiff was not at any time an employee of AJMN.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on November 21, 2016.



Mike Sokary